

Stockton East Water District Comments on Key Issues of the State Water Resources Control Board's July Workshop for Review of Standards for San Francisco Bay/Sacramento-San Joaquin Delta Estuary.

The Stockton East Water District (SEWD) has reviewed the key issues for this workshop and has the following comments on the first two key issues:

Issue 1. WHAT FISH AND WILDLIFE STANDARDS SHOULD THE SWRCB EVALUATE AS ALTERNATIVES IN THIS REVIEW?

SEWD believes that the SWRCB should utilize numerous parameters to establish standards for fish and wildlife. A combination of parameters will best enable to SWRCB to provide the requisite protection while minimizing impacts upon water users. For example, physical improvements should be utilized when possible as opposed to flow requirements when they accomplish the same or similar benefits.

In addition, SEWD would encourage the SWRCB to make recommendations to other agencies to take action which could improve the condition in the Bay-Delta estuary for fish and wildlife without requiring additional flows. In addition, the SWRCB should undertake all actions within its power to enforce existing law and regulations which would improve conditions in the Bay-Delta estuary without the need for additional flows (i.e. water quality regulations).

Issue 2. HOW SHOULD THE ECONOMIC AND SOCIAL EFFECTS OF ALTERNATIVE STANDARDS BE DETERMINED?

SEWD does not intend at this time to undertake an economic analysis of any sets of alternative standards. In addition, while SEWD does not have recommended methods to address any of the items listed by the SWRCB under Issue 2, SEWD does have items for consideration by the SWRCB when calculating economic and social effects of alternative standards.

1. The SWRCB should consider not only the economic and social impacts of the loss of a particular water supply, but also consider those impacts in light of the ability of a particular water user to replace that supply. In many instances there are no alternative sources of supply, which enhance the economic and social impacts disproportionately.

2. The SWRCB should also be careful not to assume that water transfers and marketing can lessen the economic and social impacts of reduced water supplies. Similarly, in many instances water users are not physically located so as to take advantage of any water transfer opportunities.

3. The impact of reduced water supplies on groundwater sources should also be carefully considered. Particularly where irreversible environmental damage can occur to groundwater aquifers if no alternate sources of water are available.